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**IN THE UNITED STATES DISTRICT COURT
FOR THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

LISA S. BLACK,)	CIVIL ACTION NO. 05-0038
)	
Plaintiff,)	
)	
vs.)	
)	DECLARATION OF MICHAEL W.
JIM BREWER, individually and in his)	DOTTS IN SUPPORT OF SECOND
official capacity as Acting Principal for)	MOTION TO COMPEL
Hopwood Junior High School,)	
COMMONWEALTH OF THE NORTHERN)	
MARIANA ISLANDS PUBLIC SCHOOL)	
SYSTEM, and JOHN AND/OR JANE DOE,)	
)	
Defendants.)	

I, Michael W. Dotts, declare under the penalty of perjury according to the laws of the Commonwealth of the Northern Mariana Islands and the United States of America, that the following is true and based upon my personal knowledge, except where noted otherwise, and if called to testify, I could do so competently:

1. On August 7, 2006, I met and conferred with the attorneys for CNMI Public School System and Jim Brewer to attempt to resolve several issues that have arisen with regard to the

1 various Defendants' responses to Plaintiff's latest round of discovery requests. Specifically,
2 these are the issues raised in the letter from George L. Hasselback to the Defendants' attorneys
3 dated August 5, 2006 and attached to my client's Memorandum in Support of Second Motion
4 To Compel.
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7 2. Additionally, I suggested that, in order to save this Court and the parties time and
8 expense in holding another hearing on discovery issues, that if we could not resolve these
9 issues, that the parties stipulate to having both of these Motions to Compel heard on the same
10 date.
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13 3. Counsel for the Defendants refused to amend their answers to the disputed discovery
14 requests, but agreed to stipulate to having both of these motions heard at the same time on
15 August 24, 2006. I then informed George Hasselback of this stipulation and asked that he
16 make arrangements with the Court to reschedule the hearing on both motions for a time on
17 August 24, 2006.
18

19 Signed on Saipan, Commonwealth of the Northern Mariana Islands, this 7th day of
20 August, 2006.
21

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23
24 /s/_____
25 Michael W. Dotts
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